

Pursuant to 28 U.S.C. § 1441 *et seq.*, Defendant Experian Information Solutions, Inc. (“Experian”), hereby files this Notice of Removal of the above-captioned action to this Court and state as follows::

1. Experian, Selene Finance LP (“Selene”), Trans Union, LLC (“Trans Union”), Shellpoint Mortgage Servicing (“Shellpoint”), and Equifax Information Services, LLC (individually “Equifax,” collectively, “Defendants”) are named Defendants in Civil Action No. 606509/2024 filed by Plaintiff Maria Davanzo (“Plaintiff”) in the Supreme Court for the State of New York, County of Suffolk (the “State Court Action”).

2. The Complaint in the State Court Action was filed with the Clerk of the Supreme Court on March 13, 2024.

3. This Notice is being filed with this Court within thirty (30) days after Experian received a copy of Plaintiff’s initial pleading setting forth the claims for relief upon which Plaintiff’s action is based.

4. This Court is the proper district court for removal because the State Court Action is pending within this district.

5. Pursuant to 28 U.S.C. § 1446(a), a copy of all process, pleadings, and orders served upon Defendants in the State Court Action is attached hereto as **Exhibit A**.

6. Experian is a corporation which, for monetary fees, regularly engages in whole or in part in the practice of assembling consumer credit information or other information on consumers for the purpose of furnishing consumer reports to third parties. Experian uses means or facilities of interstate commerce for the purpose of preparing or furnishing consumer reports, and therefore is a “consumer reporting agency” within the meaning of 15 U.S.C. § 1681a(f).

7. Equifax and Trans Union are companies which, for monetary fees, regularly engage in whole or in part in the practice of assembling credit information or other information on consumers for the purpose of furnishing consumer reports to third parties. Equifax and Trans Union use means or facilities of interstate commerce for the purpose of preparing or furnishing consumer reports, and therefore each are a “consumer reporting agency” within the meaning of 15 U.S.C. § 1681a(f).

8. Selene is a limited partnership which regularly furnishes information to one or more consumer reporting agencies about its transactions or experiences with consumers, and therefore is a “furnisher of information” within the meaning of 15 U.S.C. § 1681s-2.

9. Shellpoint is a company which regularly furnishes information to one or more consumer reporting agencies about its transactions or experiences with consumers, and therefore is a “furnisher of information” within the meaning of 15 U.S.C. § 1681s-2.

10. The claims for relief against Defendants alleged in the State Court Action arise under the Fair Credit Reporting Act, 15 U.S.C. §§ 1681 *et seq.* Thus, this Court has original subject matter jurisdiction over the above-captioned action pursuant to 28 U.S.C. § 1331 and 15 U.S.C. § 1681p. The above-captioned action may properly be removed to this United States District Court pursuant to 28 U.S.C. § 1441(a).

11. Defendants that have been served with the summons and complaint in the State Court Action consent to removing the above-captioned action to this court. Defendants’ consents to removal are attached hereto as **Exhibits B, C, and D**. While Shellpoint consents to removal, it has not yet been served with summons and complaint in this action and therefore its consent to removal is not required. 28 U.S.C. § 1446(b)(2)(A).

12. Promptly after the filing of this Notice of Removal, Defendants shall provide notice of the removal to Plaintiff through her attorney of record in the State Court Action, and shall file a copy of this Notice with the clerk of the Court in the State Court Action, as required by 28 U.S.C. § 1446(d).

Dated: May 17, 2024

Respectfully submitted,



Sean Skedzielewski
JONES DAY
250 Vesey Street
New York, NY 10281
Telephone: 212.326.3462
Facsimile: 212.755.7306
Email: sskedzielewski@jonesday.com

*Attorney for Defendant
Experian Information Solutions, Inc.*